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9
10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 [REDACTED]
16 CHRISTOPHER BERCIER, and
17 [REDACTED],

18 Defendants.

2:23-CR-70-MKD-2

INDICTMENT

18 U.S.C. §§ 922(g)(1), 924(a)(8),
Felon in Possession of Firearms
(Count 1)

18 U.S.C. §§ 922(j), 924(a)(2)
Possession of Stolen Firearms
(Count 2)

18 U.S.C. § 933(a)(1), (a)(3), (b)
Firearms Trafficking
(Count 3)

18 U.S.C. § 924, 18 U.S.C. § 934,
28 U.S.C. § 2461(c)
Forfeiture Allegations

24 The Grand Jury charges:

25 As to Counts 1 - 3 set forth below, the following firearms are hereby alleged:

- 26
27 – U.S. Springfield Armory Model 1898 .30 caliber rifle bearing serial
28 number 251753;

- 1 – U.S. Property Enfield Model No. 4 MK1 .303 caliber rifle bearing
2 serial number 0C47730;
3
- 4 – Russian Mosin-Nagant Sporterized Carbine Model 91 7.62 x 54 mm
5 caliber bolt-action rifle bearing serial number 34559;
6
- 7 – National Ordinance Model 1903A3 .30-06 caliber bolt-action rifle
8 bearing serial number 5006999;
9
- 10 – U.S. Rock Island Model 1903 .30-06 caliber bolt-action rifle bearing
11 serial number 430573;
12
- 13 – Marlin Model 336A .32 special caliber lever-action rifle bearing serial
14 number F28096;
15
- 16 – Long Branch Model No. 4 MK1 .303 British caliber rifle bearing
17 serial number 83L9225;
18
- 19 – Remington Arms Co. Woodmaster Model 742 .30-06 caliber semi-
20 automatic rifle bearing serial number 38214;
21
- 22 – Remington Arms Co. Union Metallic CTG. Model 11 12 gauge
23 shotgun bearing serial number 249130;
24
- 25 – US Carbine Model 11 .30 caliber with synthetic stock bearing serial
26 number 2203494;
27
- 28 – Winchester Model 250 .22 caliber rifle bearing serial number 757019;
29
- 30 – Winchester Model 290 .22 caliber rifle bearing serial number
31 B882285;
32
- 33 – Remington Arms Co. Model 8 .35 caliber rifle bearing serial number
34 F23868;
35
- 36 – The Marlin Firearms Co. Papoose Model 70P .22LR caliber rifle
37 bearing serial number 124414455;
38

- 1
- 2 – Harrington & Richardson, Inc. Topper Model 158 30-30 caliber rifle
- 3 bearing serial number AM289324;
- 4
- 5 – Winchester Model 320 .22 caliber rifle bearing serial number D24216;
- 6
- 7 – Italian Caranco Carbine 6.5 x 52mm caliber rifle bearing serial
- 8 number SQ4585;
- 9
- 10 – Russian Mosin-Nagant Carbine Model 1891/59 7.62 x54Rmm caliber
- 11 rifle bearing serial number 1KH9198;
- 12
- 13 – Russian Mosin-Nagant Carbine Model 91/30 7.62 x54R caliber rifle
- 14 bearing serial number EM712;
- 15
- 16 – CZ-VZ24 Model 98 8mm mauser caliber rifle bearing serial number
- 17 TR18997;
- 18
- 19 – Chilean Model 1912 7.62 Nato caliber bolt-action rifle bearing serial
- 20 number D512;
- 21
- 22 – Winchester Model 121 .22 caliber bolt-action rifle bearing serial
- 23 number Z221146;
- 24
- 25 – Turkish Model Mauser 98 7.92x57mm caliber bolt-action rifle bearing
- 26 serial number 181652;
- 27
- 28 – CZ Model 52 7.62x45mm caliber semi-automatic rifle bearing serial
- number E37999;
-
- U.S. Springfield Model 1903 .25-06 caliber bolt-action rifle bearing
- serial number 1483164;
-
- Kmart Corporation Model 251 20 gauge shotgun bearing serial
- number 29050999;
-
- Saiga Model 308-1 Sporter 7.62x51caliber semi-automatic rifle
- bearing serial number H03740570;

- Mossberg Model 800BD .243 winchester caliber bolt-action rifle bearing serial number 19229B;
- J. Stevens Arms & Tool Co. Model Crack Shot .22 caliber rifle bearing serial number VQ719;
- CDM Products Inc. Model CDM .22 caliber revolver bearing serial number 263409;
- Harrington & Richardson Inc. Model 622 .22LR caliber revolver bearing serial number AZ014317;
- Hi Standard Sentinel Model R-103 .22 caliber revolver bearing serial number 1376291;
- Hi Standard Duramatic Model 101 .22LR caliber pistol bearing serial number 852409;
- Ruger Mark II Target .22LR caliber pistol bearing serial number 21532213;
- Ruger Model 22/45 Target .22LR caliber pistol bearing serial number 22045026;
- Astra Cub .22 short caliber semi-automatic handgun bearing serial number 92088;
- Colt Officers Model .38 special caliber revolver bearing serial number 930846;
- Hi Standard Double Nine Model W-100 .22 caliber revolver bearing serial number 866201;
- Colt Model Police Positive .38 special caliber revolver bearing serial number 29894;
- Llama Parabellum 9mm caliber semi-automatic handgun bearing serial number 730685;

- Colt Model Army Special 32-30 W.C.F. caliber revolver bearing serial number 335214;
- Manurhin Model PPK/S .380ACP caliber pistol bearing serial number 2630635;
- Manurhin Model PP 7.65mm caliber pistol bearing serial number 81774;
- Bond Arms Model Texas Defender .45 colt caliber or 410 shotgun shell pistol bearing serial number 14566;
- Para Ordinance Model P12-45 .45ACP caliber pistol bearing serial number RJ10899;
- Imez Model IJ-70-18A 9 x18 mm caliber pistol bearing serial number H607982;
- CZ Makarov Model 82 9x18 caliber semi-automatic handgun bearing serial number 095704;
- Remington Field Master Model 572 .22 caliber rifle bearing serial number A1430517;
- Savage Model 720 12 gauge shotgun bearing serial number 92326;
- Marlin Firearms Model 882SS .22 caliber rifle bearing serial number 98702271;
- Winchester Model 70 .300 win caliber rifle bearing 516733;
- National Ord. Inc. U.S. Carbine .30 caliber rifle bearing serial number 7679;
- Browning Arms Co. .22 caliber rifle bearing serial number 21896T37;
- Remington Model 12 .22 caliber pump-action rifle bearing serial

number 727442;

- Remington Model 12 .22 caliber pump-action rifle bearing serial number 803634;
- Winchester Model 62A .22 caliber rifle bearing serial number 207509;
- The Marlin Firearms Co. Model Golden 39A .22 caliber rifle bearing serial number V9720;
- Savage Arms Co. Model 1899 .25-.35 caliber rifle bearing serial number 83664;
- Savage Arms Co. Model 1899 30-30 caliber rifle bearing serial number 81418;
- Savage Arms Co. Model 99 250-3000 caliber rifle bearing serial number 305707; and
- U.S. Springfield Armory Model 1903 – Mark I .30-06 caliber bolt-action rifle bearing serial number 1134952.

COUNT 1

On or about September 9, 2022, in the Eastern District of Washington, the Defendants, [REDACTED] CHRISTOPHER BERCIER, and [REDACTED] each knowing of his or her status as a person previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and intentionally possess in and affecting commerce the firearms listed above, which firearms had theretofore been transported in interstate and foreign commerce, all in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(8).

COUNT 2

On or about September 9, 2022, in the Eastern District of Washington, the Defendants, [REDACTED] CHRISTOPHER BERCIER, and [REDACTED] did knowingly and intentionally possess stolen firearms listed above, which had been shipped and transported in interstate commerce, knowing or having reasonable cause to believe the firearm was stolen, in violation of 18 U.S.C. §§ 922(j), 924(a)(2).

COUNT 3

On or about September 9, 2022, in the Eastern District of Washington, the Defendants, [REDACTED] CHRISTOPHER BERCIER, and ASHL [REDACTED] did ship, transport, transfer, cause to be transported, or otherwise dispose of the firearms listed above to others, to include Alejandro Torres and Edward Salvador, in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearms by Alejandro Torres and Edward Salvador would constitute a felony, and did conspire to do so, in violation of 18 U.S.C. § 933(a)(1), (a)(3), (b).

NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated herein by this reference for the purpose of alleging forfeitures.

1 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
2 of an offense(s) in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(8); and/or 18 U.S.C.
3 §§ 922(j), 924(a)(2); and/or 18 U.S.C. § 933, by way of 18 U.S.C. § 934(B), as set
4 forth in this Indictment, Defendants, [REDACTED]
5
6 CHRISTOPHER BERCIER, [REDACTED] shall forfeit to the United
7
8 States of America, any firearms and ammunition involved or used in the
9
10 commission of the offense, including, but not limited to:

- 11 – Turkish Model Mauser 98 7.92x57mm caliber bolt-action rifle bearing
12 serial number 181652;
- 13 – CZ Model 52 7.62x25mm caliber semi-automatic rifle bearing serial number
14 E37999;
- 15 – Harrington & Richardson Inc. Model 622 .22LR caliber revolver bearing
16 serial number AZ014317;
- 17 – Ruger Model 22/45 Target .22LR caliber pistol bearing serial number
18 22045026;
- 19
20 – Colt Officers Model .38 special caliber revolver bearing serial number
21 930846;

22 Pursuant to 18 U.S.C. § 934, upon conviction of an offense in violation of 18
23 U.S.C. § 933, as set forth in this Indictment, Defendants, [REDACTED]
24
25 [REDACTED], CHRISTOPHER BERCIER, [REDACTED] shall forfeit to
26 the United States of America, any property constituting or derived from any
27
28 proceeds obtained directly or indirectly as a result of the violation and any property

1 used or intended to be used in any manner or party to commit or to facilitate the
2 commission of such violation.
3

4 DATED this ____ day of June 2023.

5 A TRUE BILL

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8 _____
9 Foreperson

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11 Vanessa R. Waldref
12 United States Attorney

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14 _____
15 Caitlin Baunsgard
16 Assistant United States Attorney
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